

DEPT. OF TRANSPORTATION
DOCKET # 3501 23rd Avenue • Council Bluffs, IA 51501
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240668

NAME: Lucinda Shannon

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DOCKET NUMBER: FMCSA-2002-12334 - 346

1. Please indicate your primary occupation(s) from the following list:

- | | |
|---|---|
| <input type="checkbox"/> Truck Driver | <input type="checkbox"/> Owner-Operator |
| <input type="checkbox"/> Motor Coach / Bus Driver | <input type="checkbox"/> Fleet Manager / Owner |
| <input checked="" type="checkbox"/> Company Safety Director | <input type="checkbox"/> Transit System Administrator |
| <input type="checkbox"/> Commercial Driver Trainer | <input type="checkbox"/> Motor Carrier Insurance Provider |
| <input type="checkbox"/> Risk Assessment Specialist | <input type="checkbox"/> Labor Union Representative |
| <input type="checkbox"/> Motor Vehicle Admin. (State Driver's Licenses) | <input type="checkbox"/> Enforcement Officer (motor carrier safety) |
| <input type="checkbox"/> Public Interest Group | <input type="checkbox"/> Other |

2. Do you think a graduated commercial driver's license (GCDL) is needed?

- ☒ Yes ☐ No

3. Should issuance of a GCDL be linked to enrollment in a commercial driving training program?

- ☐ Yes ☒ No

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...cula of a commercial driver training program meet widely-endorsed standards for a student to be eligible to receive a GCDL while in training?

N/A

5. Approximately how many months/years of entry level training and experience should new drivers receive before "graduating" to an unrestricted CDL?

3 months

6. Should an applicant's past driving record be considered in issuing a GCDL?

☒ Yes

☐ No

7. How many of each of the following types of motor vehicle accidents and convictions within the past 12 months should cause an application to be denied a GCDL?

☒ Passenger car or light truck motor vehicle accidents

☒ DUI/DWI convictions

☒ Reckless driving convictions

☒ Other convictions for motor vehicle traffic control violations

☒ Controlled substances convictions

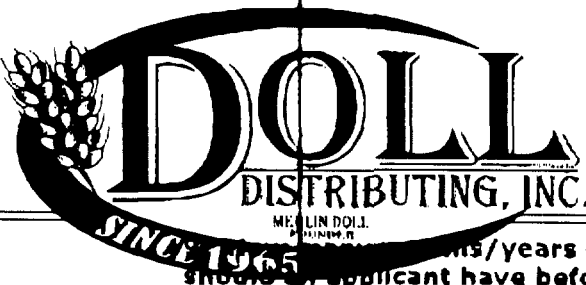
☒ Traffic violations and citations

8. Should penalties for drivers holding a GCDL, who have at-fault accidents or moving violations, be more severe than those for drivers with an unrestricted CDL?

N/A

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How many years of passenger car or light truck driving experience should an applicant have before being issued a GCDL?

6 month's

10. Which of the following restrictions should apply to entry level drivers operating under a GCDL?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Reduced hours of service | <input type="checkbox"/> Other |
| <input checked="" type="checkbox"/> Limitations on equipment type (e.g., doubles/triples, tank vehicles, motor coaches, etc.) | <input checked="" type="checkbox"/> Limitations on types of cargo (e.g., hazardous materials, livestock, liquids, etc.) |
| <input type="checkbox"/> Limitations on weather and visibility conditions (e.g., ice, snow, fog, night driving) | <input type="checkbox"/> Limitations on geography or terrain features (e.g., mountains) |
| <input checked="" type="checkbox"/> Limitations on distance or types of highways (e.g., miles per day, interstate highways, etc.) | |

11. Should a fully licensed CDL driver be required to accompany and observe a driver with a GCDL? If yes, for how many weeks/months/years?

☐ Yes ☒ No

12. What is the minimum age at which an applicant should be eligible to receive a graduated CDL?

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13. Assuming that training requirements are met, what is the minimum age at which the holder of a graduated CDL should be eligible to graduate to an unrestricted CDL?

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14. How much testing (knowledge and road test) should be given to GCDL holders prior to issuing an unrestricted CDL?

- ☒ Single test to "graduate" to an unrestricted CDL
- ☐ Periodically while holding a GCDL until training is complete
- ☐ Initial test plus re-test at 1 year after receiving initial GCDL
- ☐ Other

15. What other factors do you feel must be addressed in the implementation of a graduated CDL program?

To benefit my small business and alleviate the shortage of CDL drivers faced by beer wholesalers and the small business community at large, drivers need not necessarily ever graduate to a full, unrestricted CDL. If CDLs are restricted by age of driver, weight of vehicle, length of vehicle, terrain, distance driven, conditions, time of day and other factors, drivers may not need to ever graduate to a full and unrestricted CDL to be of maximum benefit to a beer wholesaler or other small business engaged in local delivery. I urge the DOT to consider implementing a system of graduated licensing in which each level of the CDL can be considered a CDL in its entirety and need not necessarily be considered only a stepping-stone to the unrestricted CDL.

16. What costs would you or your organization anticipate incurring if a GCDL program is implemented?

A CDL could actually result in cost savings for beer wholesalers and small business, in general. Beer wholesalers bear the financial burden of training CDL drivers, and are happy to do so. However, when recently certified CDL drivers are "cherry picked" from my company to become long haul, over the road drivers, I am left to begin the process all over again at a significant expense. If my business could employ a driver who had mastered a set of skills that allowed him to safely operate a commercial vehicle for delivering our product, without a full, unrestricted CDL, that would result in a cost savings for my business. These savings could then be used for greater job creation, warehouse improvement, greater retail execution and a host of other pro-growth economic initiatives.

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